

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings contains changes to Figure 11. This sheet replaces the original sheet including Figure 11. In Figure 11, the figure has been amended to improve the image quality.

Attachments: 1 Replacement Sheet

REMARKS

Claims 15, 17-34 and 37 are currently pending in the subject application and are presently under consideration. Claims 32, 33, and 37 have been amended as shown at pages 7-8 of the Reply.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Objection to Drawings

The informal drawing number 11 is not of sufficient quality to permit examination. Figure 11 has been amended to cure any deficiencies related to this objection. Accordingly, withdrawal of this objection is respectfully requested.

II. Rejection of Claims 32, 33 and 37 Under 35 U.S.C §112

Claims 32, 33 and 37 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 32, 33 and 37 have been amended to cure any deficiencies related to this rejection. Therefore, withdrawal of this rejection is respectfully requested.

III. Rejection of Claims 32, 33 and 37 Under 35 U.S.C. §101

Claims 32, 33 and 37 stand rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claims 32, 33 and 37 have been amended to cure any deficiencies related to this rejection. Consequently, this rejection should be withdrawn.

IV. Rejection of Claims 15, 17-34 and 37 Under 35 U.S.C. §102(e)

Claims 15, 17-34 and 37 stand rejected under 35 U.S.C. §102(e) as being anticipated by Ranjit Notani (U.S. Patent Number 6,119,149). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Notani does not teach or suggest each and every limitation of applicants' claimed invention.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that “each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

The subject invention relates to providing a framework for exchanging data in various formats between trading partners in a supply chain, storing the data with data relationships clearly identified, and making the data visible in a consistent manner across the supply chain. For instance, data from three trading partners in a supply chain can be stored in a data store and relationships between their data can be established. A purchase order from the first trading partner can be related to a shipping confirmation from the second partner and a receipt confirmation from the third partner. By entering the purchase order number, shipping number, or receipt number, any of the three trading partners can view the data relating to this series of transactions. In particular, as recited in amended independent claim 15 (and similarly recited in independent claims 31-33, and 37), applicants’ claimed invention can *establish one or more relationships within the supply chain data store between a first supply chain data item originating from a first supply chain member and one or more second supply chain data items originating from one or more second supply chain members.*

Notani does not teach or suggest the aforementioned novel aspects of applicants’ invention as recited in the subject claims. Notani teaches workflows that are used to manipulate data as it is transmitted between two trading partners. These workflows are code that are contained and run within a Global Collaboration Manager, which is outside of the data store. Notani is silent regarding establishing one or more relationships *within the supply chain data store* between a first supply chain data item originating from a first supply chain member and one or more second supply chain data items originating from one or more second supply chain members. The Examiner asserts in the Office Action that a hub and spoke architecture facilitates establishing relationships of data items and therefore anticipates the novel features of the subject claims. However, a hub and spoke architecture merely facilitates exchange of data between hubs and spokes. It does establish relationships between data items within a data store. Furthermore, it is not inherent that a system that establishes relationships between data items in a data store would establish a relationship between a first supply chain data item originating from a first

supply chain member and one or more second supply chain data items originating from one or more second supply chain members. This relationship must be explicitly established.

Furthermore, claim 17 recites *an ownership identifier is established within the supply chain data store for one or more supply chain data items*. Applicants' claimed invention allows for a data item or a group of data items in the data store to be identified as belonging to an entity, such as a company. This allows for multiple entities to each have ownership to a portion of the data items within the data store. Contrary to assertions in the Office Action, verifying that a partner is how it claims to be, plus the ability to collect data grouped by partnership does not establish ownership of data.. Public key encryption verifies access rights and authentication, meaning that the party trying to access the data has privilege to access the data and the party is who they claim to be. Access rights are not analogous to ownership rights. An owner has the ability to grant access rights, however, a user with only access privileges does not have that right. Moreover, public key encryption is implemented at the communication layer, and not in the data store. Furthermore, grouping of data is not the same as establishing ownership. A system can group data provided by a first entity and establish ownership of that data to a second entity. The ownership identifier must be explicitly established. Therefore, Notani fails to teach or suggest an ownership identifier is established within the supply chain data store for one or more supply chain data items.

Accordingly, applicants' representative respectfully submits that Notani fails to teach or suggest all limitations of applicants' invention as recited in independent claims 15, 31-33, and 37 (and all claims that depend therefrom), and thus fails to anticipate the subject claimed invention. Therefore, it is readily apparent that this rejection should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [OPTP101USB].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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